



Omgevingsdienst
IJSSSELLAND

provincie  **Overijssel**



 **RegioZwolle**
een bestuurlijke samenwerking
van 20 gemeenten en 4 provincies



Building the National Network System
for Environmental Protection

***Shared knowledge
in a single homoeogeneous network***

The Italian Experience on IED inspections

IMPEL Next Generation Conference

26 September 2018

Zwolle, the Netherlands

Session 3: IMPEL Review Initiative (IRI)

and National Peer Review Initiatives (NPRI) 'opportunities for development'

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**IMPEL Next
Generation
Conference**

**25-28 September,
Zwolle,
the Netherlands**

Background

Relevant outcomes of the **IRI in ARPA Lombardia** - Como Department - on May 21-24 2012

IED Legislation
changed in
2014

- Any violation of an IPPC permit has to be sent immediately to the prosecutor. In some European member states there is a more flexible system to deal with violation of IPPC permits which is very strict on criminal breaches and less strict on minor breaches.

Specific tool officially
adopted by Regione
Lombardia in 2015

- Consider using IMPEL risk assessment for setting inspection priorities.

A project started in
2015 and finished in
2017

- It could be considered to compare permits for companies with plants also in other regions in order to obtain a level playing field.

A project started in
2015 andis still
ongoing

- It could be considered to give higher priority to getting other regions at the same level of expertise on IPPC inspections.**

Purposes

Drafting an overview of the situation of IED inspections among Italian EPAs

Producing a draft handbook for peer review in the italian environment system

Carrying out the first national peer review on IED inspections at a regional EPA

Producing the final report and disseminating the results at national and international level

Participants



8 Agencies

11 Experts

6 Plenary Meetings



The project

Overview of the situation and best practices in environmental inspections in Italy (focus IED)

First phase: collection of programmatic-organisational and technical-procedural data and **information on the IED inspections** conducted by all regional/provincial Environmental Agencies and by ISPRA.

Second phase: **peer review** of Environmental Agencies selected on a voluntary basis. The peer review was carried out based on the IMPEL REVIEW INITIATIVE (IRI) set up by IMPEL.



The Questionnaire

150 questions in 16 sections

2 groups of topics: **programmatic-organizational** and **technical-procedural**

19 Regional Agencies out of 21 have answered the questionnaire

The national Agency ISPRA has answered the questionnaire

The regional Agencies answering the questionnaire sum up some **7.800 italian municipalities**

The regional Agencies answering the questionnaire cover more than **6.000 IED installations of regional level**



ARPA's role in IED inspections: assessment of technical,procedural, programmatic and organisational aspects

0. Personal details

- 1. Identification of the audit team*
- 2. Scheduling and drafting of a detailed control plan*
- 3. Audit execution times*
- 4. Any provisions/procedures/instructions issued by the Management of the participating Environmental Agencies*
- 5. Transmission and evaluation of the plant operator's monitoring and self-control data*
- 6. Assessment by ARPA of the plant operator's disclosure obligations*
- 7. Sampling and subsequent laboratory analyses carried out by ARPA as part of an audit*
- 8. Verification by ARPA of requirements and obligations related to the following environmental parameters: wastewater, emissions into the atmosphere, waste products, noise, odour, protection of soil and groundwater, etc.*
- 9. Assessment of the application of general and industry-specific BATs*
- 10. Promotion of compliance and continuous improvement*
- 11. Directions to the Competent Authority*
- 12. Baseline report*
- 13. Emmission Trading (CO₂ and climate change)*
- 14. Companies with a major accident risk (Seveso Directive)*
- 15. Livestock enterprises - IPPC activities referred to in point 6.6 of Annex 8*
- 16. Economic impact of the IPPC audits on ARPA*

Compiling instructions

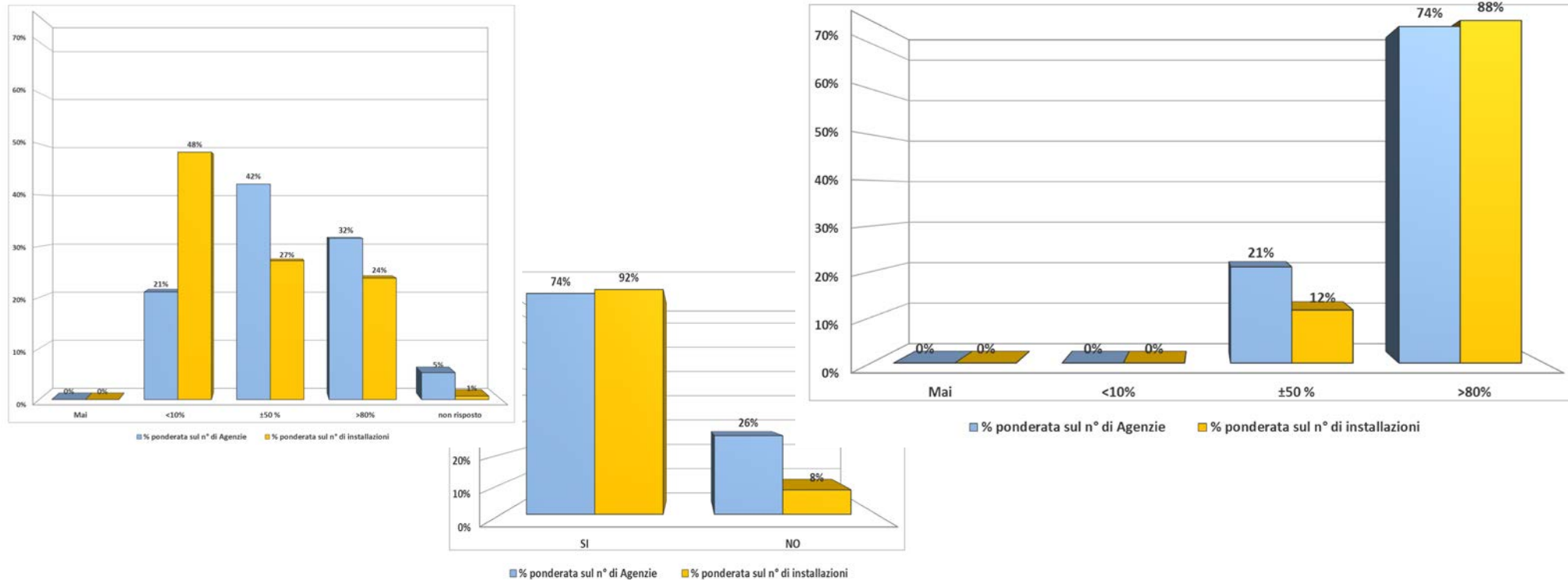
First type: YES / NO / sometimes

Second type: NEVER, <10% (infrequently carried out actions), ± 50% (averagely carried out actions), > 80% (frequently carried out actions)

Third type: use of numbers or explanations

First and second type answers: please tick in the proper box.

THE SURVEY



All the questionnaire feed backs transposed into diagrams

Comments and conclusions to each section

Summary conclusion and main findings

SWOT Analysis on the Italian IED Inspection System

	S	W
Origine interna	<ul style="list-style-type: none"> Omogenea valutazione delle comunicazioni effettuate dal gestore. Significativa attività di campionamento <p>Dialog with dutyholders</p> <ul style="list-style-type: none"> Valutazione sistematica e non episodica degli autocontrolli del gestore. 	<p>Evaluations of self-checks often made only in conjunction with inspections</p>
Origine esterna	<p>Coordination of IED and Seveso inspections</p>	<p>Difficulties in interpret. of correct BAT implement.</p>

S	W
<ul style="list-style-type: none"> Costituzione dei team ispettivi a livello territoriale (migliore conoscenza del contesto). Presenza di personale specializzato per le varie matrici oggetto dell'ispezione. Programmazione delle ispezioni sulla <p>Availability of specialized technicians</p> <p>ispezioni da parte del personale UPG quando presente all'interno delle Agenzie.</p> <ul style="list-style-type: none"> Attività formative diffuse nel sistema a seguito dell'emanazione di aggiornamenti legislativi. 	<ul style="list-style-type: none"> Non completa ed uniforme adozione della programmazione delle ispezioni attraverso strumenti di valutazione del rischio (tipo SSPC). Difficoltà nell'applicazione delle norme anticorruzione relativamente alla rotazione del personale. Disomogenea presenza di procedure <p>Lack of IT tools for collection of self-checks results</p> <p>rendicontazione delle attività.</p> <ul style="list-style-type: none"> Difficoltà di quantificazione delle risorse economiche necessarie a fronte delle tariffe corrisposte. Assenza sostanzialmente generalizzata di strumenti di consuntivazione dei costi legati alle attività ispettive.
O	T
<ul style="list-style-type: none"> di di di ni <p>Common training of inspectors</p> <ul style="list-style-type: none"> Creazione di una piattaforma 	<p>Under staffing</p> <p>del</p> <p>del rapporto finale e per gli aspetti</p>



The Handbook

Stato di fatto e migliori pratiche
nel campo dei controlli ambientali

**MANUALE PER L'ORGANIZZAZIONE E LA
CONDUZIONE DELLE PEER REVIEW**

Dicembre 2015

(Area 7 PT 2014-2016 - progetto RR7.2 AIA-AUA)

Manuale peer review - Dicembre 2015

Officially approved by the national council of the italian EPAs
on March 15th 2016

Developed on the pattern of the IMPEL IRI SCHEME

Field tested during the first national peer review in october
2016

The first italian peer review on IED inspection

Held in Arpa Campania from 4th to 6th October 2016

7 experts in the project team from 5 agencies

More than 30 experts from Arpa Campania

4 Topics:

- legislative and regulatory framework
- role of Arpa Campania in the permitting procedure
- organizational framework
- technical framework

1 Case study: Acerra WTE plant



11 Presentations by EPAs experts both from project team and Arpa Campania

Conclusions and main findings for each topic

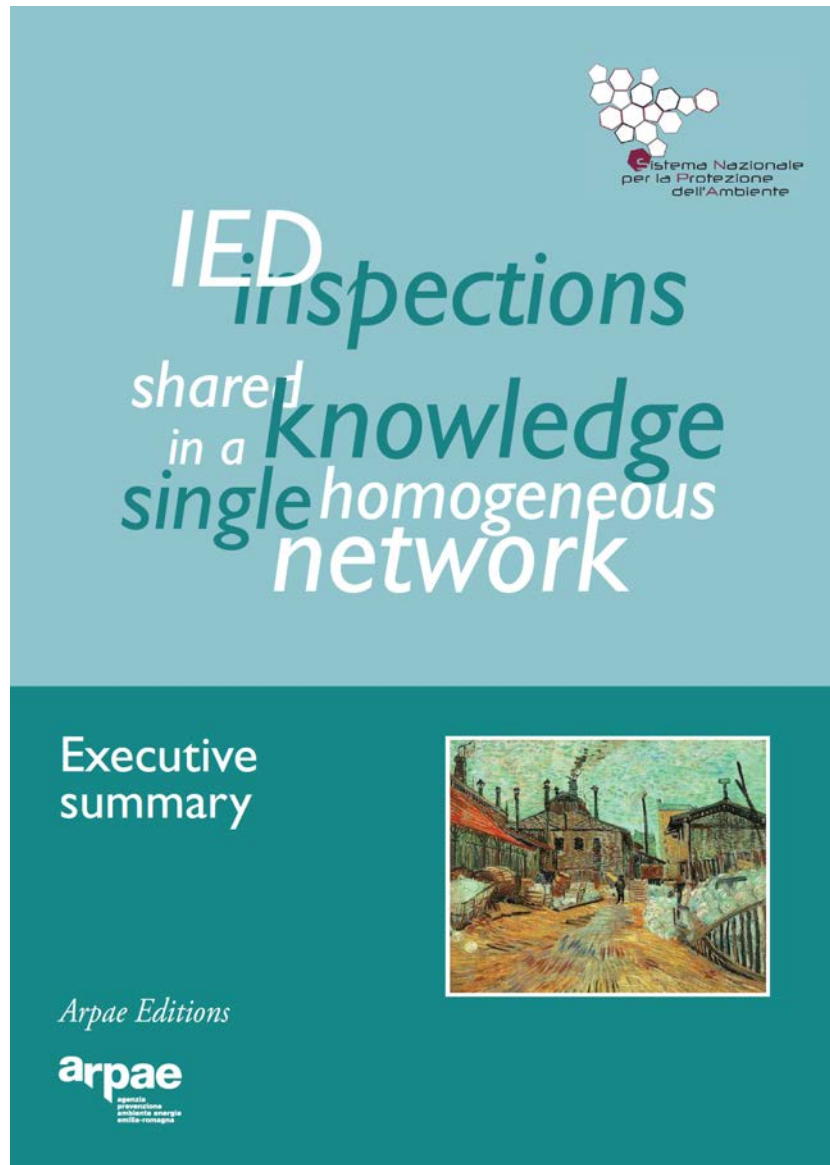
Final report approved by the participants and by the national council of the italian EPAs

Dissemination



Workshop held at
Italian Chamber of Deputies
on October 19th, 2017
presentation of the Survey, the Handbook
and the Final Report





All documents plus commented figures and diagrams
available in italian and in english at

<http://bit.ly/controlliAIA>

Lessons learnt

An assessment of the work

The IRI pattern has been almost «literally» followed

That was very good

- Product ready for use
- Interest of the organizations in taking part in the projects (middle management and technicians)
- Commitment of the people involved because of the need of sharing experience and knowledge

But

- High cost in terms of money and time as the number of *peer reviews* grows (both for hosting organization and experts)
- Follow up difficult to provide to the hosting organization
- Involvement of the top management of the organizations not really satisfactory

So in the middle term we have probably to change direction....

Remarks

Inside a single country it is likely easier to gather together organizations carrying out the same activity.

On the other side, in a single country, the processes are normally similarly regulated.

The NPRI could concern

➤ **at horizontal level:** the organizations operating in the same area of interest (e.g. inspection);

➤ **at vertical level:** the organizations operating in the same process (e.g. waste management).

But it could also take into account both a specific area of interest and a specific process (e.g. organizations issuing permits to waste management plants).

This could be a point of relevant difference of NPRI and IRI

Use the tool to achieve alignment within a network

KEY WORDS

The first word to highlight when considering NPRI is **flexibility**



The national scheme could likely be more flexible in its scope and goals than an IRI carried out among organizations from different countries.

The legislative framework is moreover common and this should help in a better understanding of the context and of the conditions.

Flexibility and a common legislative framework are really good starting points to make a NPRI easier to organise and carry out.

KEY WORDS

The national level of the NPRI could, in principle, let the review team to be really aware in advance on the objective of the review (e.g. IED inspection) in connection not just to the hosting organization but to the whole national situation on the specific issue and to the extension covered by the review.



Saving of time and more focus when carrying out the peer review.

Background knowledge is for this reason proposed as a key word of a NPRI and tools should be proposed accordingly.

KEY WORDS

Although the NPRI is conceived to watch «inside a country», conserving its **international perspective** is fundamental.

Giving up this perspective could eventually mean NPRI becomes just as making one more meeting among the many.

Conserving international background also means maintaining the right connection between NPRI and IMPEL

Really effective tools and organizational support must be identified to achieve the goal.

INTERNATIONAL



BACKGROUND

KEY WORDS



Training is really a pillar of the NPRI at every level and stage.

Tailored training programs are to be conceived for each of the figures involved in the process.

IMPEL as the promoter of both IRI and NPRI will play a key role in training activities at central and national levels.



INTERNATIONAL



BACKGROUND

